

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

ROOR INTERNATIONAL BV, a Foreign §  
Corporation and SREAM, INC., §  
a California corporation §

*Plaintiffs,* §

vs. §

ALL STAR SMOKE SHOP & VAPE §  
and JOHN DOE §

*Defendants.* §

Case Number 4:18-cv-3675

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DEFENDANT IMAGE VENTURES INC d/b/a ALL STAR SMOKE SHOP'S  
INITIAL DISCLOSURES

Defendant, IMAGE VENTURES, INC d/b/a ALL STAR SMOKE SHOP, a Texas corporation, files this, its Initial Disclosures pursuant to Fed. R. Civ. P. 26 as follows:

A. The name and, if known, the address and telephone number of each individual likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless solely for impeachment, identifying the subjects of the information.

1. Alikhan N. Patel, President  
Nadirali N. Patel, Director  
Image Ventures, Inc, a Texas corporation (Defendant)  
c/o Ted A. Cox  
TED A. COX, P.C.  
2855 Mangum Rd., Suite 100A  
Houston, Texas 77092-7463  
713-956-9400  
Defendant.
2. Corporate representative(s) and/or custodian(s) of records for  
Fumo, Inc.  
10613 Harwin Dr. #604  
Houston, Texas 77036  
888-482-6692  
Company that sold Defendant the alleged counterfeit product.

All individuals disclosed by Plaintiffs, including, but not limited to:

3. Jarir Farraj  
c/o Scott, Vicknair, Hair & Checki, LLC  
909 Pydras St., Ste 110  
New Orleans, Louisiana 70112  
Owner of the Plaintiff, Sream, Inc.
4. Brian Gaudette  
c/o Scott, Vicknair, Hair & Checki, LLC  
909 Pydras St., Ste 110  
New Orleans, Louisiana 70112  
Private investigator in this case expected to testify as to the facts and events alleged in the Plaintiffs' Complaint, specifically focused on the Defendant's sale of counterfeit ROOR products.
5. Martin Birzle  
c/o Scott, Vicknair, Hair & Checki, LLC  
909 Pydras St., Ste 110  
New Orleans, Louisiana 70112  
Owner of Plaintiff ROOR International BV
6. Bryan Malamut  
c/o Scott, Vicknair, Hair & Checki, LLC  
909 Pydras St., Ste 110  
New Orleans, Louisiana 70112  
Corporate representative of Plaintiffs Sream, Inc. and ROOR International BV. He will testify as to the facts and events alleged in Plaintiffs' Complaint.

Defendant reserves the right to supplement this initial disclosure with additional individuals as they are discovered during the course of discovery.

- B. A copy of, or a description by category and location, of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody, or control and may use to support its claims or defenses, unless the use would be solely for impeachment.

Defendant's representatives have possession of all documents concerning the purchase of water pipes and other inventory, including Invoice No. 2047 from Fumo, Inc.

Defendant reserves the right to amend this initial disclosure with additional information should it be discovered during the course of discovery.

C. A computation of each category of damages claimed by the disclosing party, making available for inspection and copying as under Rule 34 the documents or other evidentiary material, not privileged or protected from disclosure, on which such computation is based, including materials bearing on the nature and extent of injuries suffered.

Not applicable.

Defendant reserves the right to amend this initial disclosure with additional information should it be discovered during the course of discovery.

D. For inspection and copying as under Rule 34, any insurance agreement under which any person carrying on an insurance business may be liable to satisfy part or all of a judgment which may be entered in the action or to indemnify or reimburse for payments made to satisfy the judgment.

None.

Defendant reserves the right to amend this initial disclosure with additional information should it be discovered during the course of discovery.

Respectfully submitted,

TED A. COX, P.C.

/s/Ted A. Cox

Ted A. Cox, Federal ID: 3331  
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CERTIFICATE OF SERVICE

I hereby certify that on May 21, 2019, a copy of the foregoing Initial Disclosure was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access the filing through the Court's Electronic Case Filing System.

/s/Ted A. Cox

Ted A. Cox